

Teresa M. Shill, OSB #031680
E-Mail: tshill@rcolegal.com
Routh Crabtree Olsen, P.C.
11830 SW Kerr Parkway, Ste. 385
Lake Oswego, Oregon 97035
Phone: (503) 977-7926
Fax: (503) 977-7963
Attorney for Defendants Northwest Trustee Services, Inc.,
and Routh Crabtree Olsen, P.C.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

B. CAROL GLOVER,

Plaintiff,

v.

WACHOVIA EQUITY SERVICING LLC;
NORTHWEST TRUSTEE SERVICES,
INC.; WELLS FARGO HOME
MORTGAGE; and ROUTH CRABTREE
OLSEN, P.C.,

Defendants.

Case No. 11-210 HU

DEFENDANTS' NORTHWEST
TRUSTEE SERVICES, INC. AND
ROUTH CRABTREE OLSEN, P.C.'S
MOTIONS TO DISMISS
PLAINTIFF'S COMPLAINT
PURSUANT TO FRCP 12(B)(6)

LR 7-1 CERTIFICATE OF CONFERRAL

Counsel for defendants Northwest Trustee Services, Inc. and Routh Crabtree Olsen, P.C. (collectively "Defendants"), certifies that she made a good faith effort to confer by telephone with plaintiff B. Carol Glover ("Plaintiff"). On March 22, 2011 at approximately 9:30 AM, Plaintiff returned counsel's earlier voicemail message. The proposed motions were discussed. No consensus was reached, and Plaintiff asked

counsel to further put the information in a letter to her. Counsel mailed the requested letter to Plaintiff on March 22, 2011. This motion therefore follows.

MOTION

Pursuant to Federal Rule of Civil Procedure 12(b)6, FRCP 8, the doctrine of claim preclusion, claim preclusion by privity; lack of justiciable controversy, and mootness, Defendants, by and through their counsel, Routh Crabtree Olsen, P.C. and Teresa M. Shill, respectfully move this Court for dismissal of Plaintiff's claims against Defendants for failure to state a claim upon which relief can be granted, for lack of justiciable controversy, and the doctrines of claim preclusion.

In support of this Motion, Defendant relies upon the pleadings and documents on file and the supporting Memorandum, the Declaration of Teresa M. Shill, Attorney for Routh Crabtree Olsen, P.C., and the Exhibit List filed concurrently with this Motion.

DATED this 28th day of March 2011.

ROUTH CRABTREE OLSEN, P.C.

/s/ Teresa M. Shill
Teresa M. Shill, OSB # 031680
Attorneys for Defendants Northwest
Trustee Services, Inc. and Routh
Crabtree Olsen P.C.
11830 SW Kerr Parkway, Ste. 385
Lake Oswego, OR 97035-1249
Phone (503) 977-7926
Fax (503) 977-7963
tshill@rcolegal.com

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Defendants Northwest Trustee Services, Inc. and Routh Crabtree Olsen, P.C.'s Motions to Dismiss Plaintiff's Complaint Pursuant to FRCP 12(b)(6) upon the following parties on this 28th day of March, 2011.

VIA FIRST CLASS MAIL

B. Carol Glover
26736 NW Williams Canyon Road
Gaston, OR 97119
Plaintiff pro se

VIA ECF SYSTEM

John M. Thomas
Routh Crabtree Olsen, P.C.
11830 SW Kerr Parkway, Ste. 395
Lake Oswego, Oregon 97035
Attorneys for Defendants Wachovia Equity Servicing LLC
and Wells Fargo Home Mortgage

ROUTH CRABTREE OLSEN, P.C.

By /s/ Teresa M. Shill
Teresa M. Shill, OSB #031680
Attorneys for Defendants Northwest
Trustee Services, Inc., and Routh
Crabtree Olsen, P.C.
11830 SW Kerr Parkway, Ste. 385
Lake Oswego, Oregon 97035
Phone: (503) 977-7926
Fax: (503) 977-7963